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Attorneys for Defendant  
NAPHCARE, INC.

## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

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LISA N. PLONSKY,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
State of Nevada and the County of Clark; DOE  
CORRECTIONS OFFICER I, individually and in  
her official capacity as a correction officer  
employed by LVMPD at the CCDC; DOE  
CORRECTIONS OFFICER II-XX, individually  
and in their official capacities as correction  
officers employed by the LVMPD at CCDC;  
NAPH CARE, an Alabama Corporation, qualified  
to do business in the State of Nevada; DOE  
NURSES I through X; DOE CORRECTIONS  
OFFICERS I through X, inclusive; and ROE  
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:11-cv-00026-RLH-PAL

**ERRATA REGARDING STIPULATION  
AND ORDER (DOC. NO. 35) TO  
EXTEND ALL DISCOVERY  
DEADLINES FOR AN ADDITIONAL  
120 DAYS, INCLUDING AMENDED  
ORDER REGARDING THE SAME**

IT IS HEREBY STIPULATED AND AGREED between Plaintiff LISA N. PLONSKY,  
by and through her attorneys of record, Potter Law Offices; Defendant LAS VEGAS  
METROPOLITAN POLICE DEPARTMENT, by and through its attorneys of record, Olson,  
Cannon, Gormley & Desruisseaux; and Defendants NAPHCARE, INC., by and through its

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attorneys of record, Alverson, Taylor, Mortensen & Sanders, that the following corrections to the Stipulation and Order to Extend All Discovery Deadlines for An Additional 120 Days (First Request) (Doc. No. 35) be made to be in compliance with LR 26-1:

(1) That the Initial Expert Witness Disclosure Deadline of Monday, February 27, 2012 be changed to **Friday, April 27, 2012**, which is sixty (60) days before the Discovery Cut-Off date of June 26, 2012.

(2) That the Rebuttal Expert Witness Disclosure Deadline of Wednesday, March 28, 2012 be changed to **Tuesday, May 29, 2012**, which is thirty-two (32) days after the disclosure of initial experts.

(3) That the deadline for any Motions or Stipulations for extension or modification of the discovery plan be changed from Friday, April 6, 2012, to **Wednesday, June 6, 2012**, which is twenty (20) days before the discovery cut-off date.

These revisions are appropriate and necessary, as there were a handful of calculation errors which caused the aforementioned proposed discovery deadlines to fall on the incorrect dates.

DATED this 21<sup>st</sup> day of December, 2011.

DATED this 21<sup>st</sup> day of December, 2011.

POTTER LAW OFFICES

ALVERSON, TAYLOR, MORTENSEN  
& SANDERS

*/s/ Cal Potter*

*/s/ Seetal Tejura*

By \_\_\_\_\_  
CAL POTTER, III Esq. (#001988)  
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Attorney for Plaintiff  
LISA PLONSKY

By \_\_\_\_\_  
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Attorneys for Defendant  
NAPHCARE, INC.

....

....

DATED this 21<sup>st</sup> day of December 2011.

OLSON, CANNON, GORMLEY  
& DESRUISSEAU

**\*= electronic signatures entered with express  
consent of the signors**

*/s/ Thomas Dillard*

By \_\_\_\_\_  
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Attorney for Defendant  
LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT

**ORDER**

**IT IS SO ORDERED. The above proposed deadlines shall be adopted.**

DATED this 23rd day of December, 2011.

  
\_\_\_\_\_  
MAGISTRATE JUDGE PEGGY A. LEEN

Respectfully Submitted by:

ALVERSON, TAYLOR, MORTENSEN & SANDERS

*/s/ Seetal Tejura*

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